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THOMAS G. BRUTON
CLERK U.S. DISTRICT COURTTHOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

In THE UNITED STATES
 DISTRICT COURT FOR THE
 NORTHERN DISTRICT OF
 ILLINOIS

David Morris (#20150721256) } Case No. 18 C 4720
 Plaintiff, } Honorable Judge
 Vs. } Martha M. Pacolo
 P. Jones et al. } Defendants,

AMENDED COMPLAINT
 Motion for Leave to File an
 AMENDED COMPLAINT

Plaintiff, David Morris, pursuant to Rule (15)(a),
 fed.R.Civ.P., requests leave to file an amended
 complaint adding party.

Complaint under the Constitution ("Bivens" Action),
 Title 28 Section 1331 U.S Code (federal defendants)

I. Plaintiff:

A) Name: David Morris ^{on}
 (#20150721256)

B) Prisoner identification number: (#20150721256)

C) Place of present confinement: (CCDOC) Cook County Jail

D) Address: P.O. Box 089002, Chicago ILL 60608

II. Defendants:

A.) Defendant: P. Jones

Title: Superintendent

Place of Employment: Cook County Jail (CCDOC)

B.) Defendant: Thomas Dart

Title: Sheriff

50 W. Washington

Place of Employment: Daily Center ~~200 N Dearborn~~

C.) Defendant: D. Wedel

Title: C/O Correctional Officer

Place of Employment: Cook County Jail (CCDOC)

D.) Defendant: G. Morris

Title: C/O officer

Place of Employment: Cook county jail (CCDOC)

E.) Defendant: D. Fugiel

Title: C/O officer

Place of Employment: Cook County jail (CCDOC)

F.) Defendant: M. Spizzirri

Title: C/O officer

Place of Employment: Cook County jail (CCDOC)

G.) Defendant: Sgt. White

Title: Sergeant

Place of Employment: Cook County jail (CCDOC)

H. Defendant: Lt. Pranes

Title: Lieutenant

Place of Employment: Cook County jail (CCDOC)

I. Defendant: Un-Named Officers (John Doe)

Title: C/O Officers

Place of Employment: Cook County jail (CCDOC)

III. List ALL lawsuits you have filed in any state or federal court in the United States:

1) None.

IV. Statement of Claim:

I David Morris, an inmate of the Cook County jail was housed in Division 9 tier 2G in 2016, for about 2-3 months. During the time I was housed on 2G I was having problems with several detainees who claimed that since I wasn't "Gang" that they were going to rob me and, they also had been threatening to jump me and literally spit in my Ass to deprive me of my manhood. So as directed by the CCDC Handbook I reported it to staff who's reply was, that there is nothing that they could do about simple threats. The threatening went on for a few more days until someone stole my glasses and a few items of my commissary. A few days later I had dispensary and happened to come across Superintendent P. Jones of Div 9, Whereas I informed him of the threats I was receiving. I supplied him with the names and details of the events that already took place. His reply was "I don't have time for this" after more pleading from myself he then responded "That's not my problem" I then stated that I already spoke to my tier officer ~~and~~ who at the time was officer G. Morris #17686 and the Sergeant, who told me not to worry about it.

I was still very much in fear for my safety, which is why I was now speaking to the Superintendent, who had the power to relocate me but instead chose to walk away. Later that, on Dec 19, 2016, 3-11pm Shift (Every time Shift changes the New officer is supposed to do a count, and a security check, to make sure all inmates are accounted for and all doors are locked.) Furthermore in Div-9 there is a top deck and a bottom deck, due to security reasons they are not allowed to be out at the same time.) So the time is split between the two 3hours top 3hours bottom) On this day Dec 19 2016 3-11pm, Officer G. Morris #17686 and his backup officer M. Spizzirri #17807 failed to do the lock check even after being informed of my fears, ██████████ Because of this indifference, while I was in the "Dayroom" 8-12 inmates exited their cells, (cells wasn't locked) and started to do exactly what I've been afraid of, jump me, Punching and kicking me in the face, back, among other places. While this was taking place, @ I could see CO's standing by watching from the safety of the interlock door. CO's who I can now identify as G. Morris, M. Spizzirri, J. Wedel # 17957, D. Fugiel # 17873, Sgt. White #3156, Lt. Pzanes # 698, and many other officers I can not identify. As these CO's watched, while not providing any help, one of the

inmates Willie Mims # 20140814302 pulled out a sharp metal object and begin stabbing me everywhere (Neck, back, face) As this was going on again I tried to get off the tier, I ran to the interlock door. The officers didn't open the door as I begged for help. If Sheriff Thomas Dart, wrote that, or set that policy, I believe he should be held liable as well, and I do believe that our sheriff sets all policies. After a while 3-7 minutes later the inmates began to return to there cell on there own. One of the white shirts (either Sgt. White or Lt. Rzanes) finnaly gave the order for the officers to intervene and drag me off the tier. ~~Released from~~ I was then taken to the hospital and treated for stab wounds, headconcussion, among other things. Apord being released from the hospital I was taken back to Division 9. Where again I told the officers, and, ~~sgt~~, and Lt. I was afraid for my life, yet again they told me not to worry. I am going to be going to a diffrent tier. Well When I got to this New tier, the same detainees were on this tier aswell. Needless to say they dumped me again. I wrote secured grievances looking for seperation from the people involved. They havent done anything about it. I've been housed with these same people more than once. Every day I have to live in fear that I will be placed in danger and get dumped on or stabbed again.

Most recently I've been house with Kevin Meason #
20130712211, who is most definite a hazard
to my health. Since then I've gone into Deep
Depression, and now I have mental health problems,
and I can't sleep without med, because everytime
I close my eye's I picture myself getting stabbed
and beaten. I shouldn't have to live in fear. I
am supposed to be under CCDOC's protection
yet they don't do anything to help.

V.) Relief:

I would like for CCDOC to be held responsible
for each stab wound. I am asking for the amount
of 1.2 million Dollars against each defendant,
jointly and severally for ~~compensatory~~ compensatory
damages. Punitive damages in the amount of
Five hundred thousand against each defendant.

VI.) Plaintiff demands a trial by a Jury.

27 Oct. 2019

David Morris

David Morris

#20130721256

CCDOC

Po Box 089002

Chicago IL 60608



D McCoy 10/28/19

David Morris # 20150721256
PO Box 089002
Chicago IL 60608

11/13/2019-4



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Clerks Office
U.S. District Court
212 S. Dearborn St. 20th Floor
Chicago, IL 60604

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